

**EXHIBIT A****WINGATE WRITTEN DISCOVERY**

Insight Health Corp's Objections to Plaintiff's First Interrogatories and Production of Documents	1/31/13
Insight objects to 4 interrogatories and 22 requests for production, over the course of 12 pages—served by Clint Shaw, Insight's counsel	
Dr. Mathis, Dr. O'Brien and Image Guided's Answer and Cross-Claims	2/4/13
Answer and Cross-Claims encompass 16 pages—filed by Nancy Reynolds, their counsel	
Objections and Answers to Plaintiff's First Interrogatories by John M. Mathis, M.D., Robert F. O'Brien, M.D. and Image Guided Pain Management, P.C.	2/12/13
They answer 7 interrogatories and object to 2, over the course of 4 pages—served by Nancy Reynolds, their counsel	
Attestation as to answers by Mathis, O'Brien and Image Guided	2/14/13
This encompasses 3 pages	
Objections and Answers to Plaintiff's First Request for Production by John M. Mathis, M.D., Robert F. O'Brien, M.D. and Image Guided Pain Management, P.C.	2/12/13
They respond to 36 requests for production and object to 2 over the course of 9 pages, and 41 documents are produced (WINGATE 01-WINGATE 42)—served by Nancy Reynolds, their counsel	
Insight Health Corp.'s Objections and Responses to Plaintiff's First Request for Admissions	2/22/13
Insight responds to 37 requests for admission over the course of 14 pages—served by Chris Hassell, its counsel	

	<p>Insight Health's Answers to Plaintiff's First Interrogatories</p> <p>Insight answers 7 interrogatories over the course of 20 pages—served by Clint Shaw, its counsel</p>	3/13/13
	<p>Insight Health's Objections to Plaintiff's Second Interrogatories and Request for Production of Documents</p> <p>Insight objects to 3 interrogatories and 4 requests for production over the course of 5 pages—served by Clint Shaw, its counsel</p>	3/13/13
	<p>Insight Health's Responses to Plaintiff's First Requests for Production</p> <p>Insight responds to 36 requests for production over the course of 10 pages referencing 731 documents (IHC000001-IHC000731)—served by Clint Shaw, its counsel</p>	3/15/13
	<p>Insight Health's Answer to Cross-Claim of IGPM, Dr. Mathis &amp; Dr. O'Brien</p> <p>9 pages responding to 38 paragraphs of the cross-claim—filed by Chris Hassell, its counsel</p>	3/21/13
	<p>Insight Health's Response to Defendants IGPM, Dr. Mathis &amp; Dr. O'Brien's First Request for Admission</p> <p>Insight responds to 26 requests for admission over the course of 7 pages—served by Clint Shaw, its counsel</p>	4/3/13
	<p>Insight Health's Objections and Responses to Defendants IGPM, Dr. Mathis &amp; Dr. O'Brien's First Requests for Production</p> <p>Insight objects 60 requests for production over the course of 21 pages—served by Clint Shaw, its counsel</p>	4/3/13
	<p>Insight Health's Objections and Answers to Defendants IGPM, Dr. Mathis &amp; Dr. O'Brien's First Set of Interrogatories</p> <p>Insight objects to 5 interrogatories over the course of 4 pages—served by Clint Shaw, its counsel</p>	4/3/13

	<p>Insight Health's Objections to Plaintiff's Third Requests for Production of Documents</p> <p>Insight objects to 22 requests for production over the course of 10 pages—served by Clint Shaw, its counsel</p>	5/29/13
	Insight Health produces 732 documents (IHC000001-IHC000732)	6/7/13
	Insight Health produces additional documents	6/17/13
	Insight Health produces 2641 documents (IHC000733-003373)	7/26/13
	Insight Health produces 16 documents (IHC003374-003389)	8/6/13
	<p>Defendants' (IGPM, Dr. Mathis and O'Brien) Supplemental Response to Plaintiff's Requests for Production</p> <p>They supplemental their response to 1 request for production over the course of 2 pages and produce 13 documents—served by John Jessee, their counsel</p>	8/13/13
	<p>Insight Health's Responses to Plaintiff's Third Requests for Production of Documents</p> <p>Insight responds to 22 requests for production over the course of 7 pages producing 17 documents—served by Clint Shaw, its counsel</p>	8/23/13
	Insight Health produces 8 documents (IHC003407-003414)	9/5/13

	Insight Health's Objections to Plaintiff's Fourth Requests for Production of Documents  Insight objects to 19 requests for production over the course of 9 pages—served by Clint Shaw, its counsel	9/17/13
	Insight Health's Opposition to Plaintiff's Motion to Compel Discovery encompassing 35 pages  Filed by Clint Shaw, its counsel	9/17/13
	Insight Health produces 31 documents (IHC003610-003640)	9/20/13
	Insight Health's Objections and Responses to Plaintiff's Amended and Restated Rule 4:5(B)(b) Deposition Notice to Insight Health covering 65 topics over the course of 12 pages  Served by Heather Deane, its counsel	10/16/13
	Insight Health's Objections to Plaintiff's Fifth Request for Production  Insight objects to 12 requests and responds to 7 requests over the course of 7 pages---served by Clint Shaw, its counsel	10/25/13
	Insight Health's Responses to Plaintiff's Second Requests for Admission  Insight responds to 143 requests for admission over the course of 40 pages---served by Clint Shaw, its counsel	10/24/13
	Order re: 9/24/13 hearing	10/28/13
	Judge Dorsey's Letter Opinion dated 10.31.13	10/31/13

	<p>Insight Health Amended Objections and Responses to Plaintiff's Amended and Restated Rule 4:5(B)(6) Deposition Notice to Insight Health covering 65 topics over 12 pages</p> <p>Served by Heather Deane, its counsel</p> <hr/> <p>Insight Health produces 222 documents (IHC006420-IHC006641)</p>	11/8/13
	<p>Insight Health's Objections to Plaintiff's Sixth Requests for Production</p> <p>Insight objects to 5 requests for production and responds to 3 over the course of 5 pages—served by Clint Shaw, its counsel</p>	11/12/13
	Order (demurrers, denying IHC motion to extend time to file third-party claim, special pleas, denying IHC motion to amend responses to RFAs)	11/13/13
	<p>Insight Health's Amended Responses to Plaintiff's Second Requests for Admissions</p> <p>Insight responds to 143 requests for admission over the course of 29 pages—served by Heather Deane, its counsel</p>	11/19/13
	Insight Health's Motion for Leave to File Third Party Complaint	11/27/13
	Insight Health's Responses to Plaintiff's Fourth Request for Production	12/18/13
	<p>Insight responds to 19 requests for production over the course of 7 pages producing 180 documents (IHC006851-ICH007030)—served by Clint Shaw, its counsel</p>	

	<p>Insight Health's Responses to Plaintiff's Fifth Request for Production</p> <p>Insight responds to 19 requests for production over the course of 6 pages producing 180 documents (IHC006851-ICH007030)—served by Clint Shaw, its counsel</p>	12/18/13
	<p>Insight Health's Objections to Plaintiff's Supplemental Interrogatory</p> <p>Insight objects to supplemental interrogatory—served by Heather Deane, its counsel</p>	12/30/13
	<p>Defendants' (IGPM, Mathis &amp; O'Brien) Answer and Cross-Claims encompassing 15 pages</p> <p>Filed by Nancy Reynolds, their counsel</p>	12/31/13
	<p>Insight Health's Answers to Plaintiff's Amended Complaint (Portions filed under seal)</p> <p>Filed by Clint Shaw, its counsel</p>	1/6/14
	<p>Insight Health's Answers, Grounds of Defense, and Cross Claim to Plaintiff's Amended Complaint encompassing 45 pages</p> <p>Filed by Clint Shaw, its counsel</p>	1/6/14
	<p>Defendants' (IGPM, Mathis &amp; O'Brien) Answer to Cross-Claim encompassing 5 pages</p> <p>Filed by Nancy Reynolds, their counsel</p>	1/13/14

**WINGATE DEPOSITIONS**

**19 DEPOSITIONS OVER 13 CALENDAR DAYS**

**Sharon Wingate**

- April 29, 2013
- 108 pages
  - Started at 10:02 a.m. and lasted until 12:35 p.m.
  - The deposition lasted 2 hours and 33 minutes
- Image Guided Pain Management, P.C., Dr. Mathis and Dr. O'Brien noticed the deposition
  - Plaintiff and plaintiff's counsel were present
  - Insight Health Corp. attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
- Ms. Wingate was the plaintiff in *Wingate v. Insight Health Corp., et al.*

**Paul Hellkamp**

- May 7, 2013
- 265 pages
  - Deposition started at 11:05 a.m. and lasted until 6:51 p.m.
  - The deposition lasted 7 hours and 46 minutes
- The plaintiff noticed the deposition
  - Insight Health Corp. attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - The plaintiff attended by counsel
- Paul Hellkamp is the Center Manager for Insight Health Corp.'s Roanoke location
  - Mr. Hellkamp discussed the ownership history of Insight Imaging-Roanoke
  - Mr. Hellkamp discussed when that facility started offering epidural steroid injections
  - Mr. Hellkamp discussed from where that facility obtained medication
  - Mr. Hellkamp discussed how that facility started obtaining medication from NECC
  - Mr. Hellkamp discussed the records from NECC it kept
  - Mr. Hellkamp discussed microbiology reports
  - Mr. Hellkamp discussed the ordering process from NECC
  - Mr. Hellkamp discussed receiving notice from NECC about the recall and the response thereto (including patient notification)
  - Mr. Hellkamp discussed the involvement of Insight and CDI to the recall

- Mr. Hellkamp discussed the ESI process at Insight Imaging-Roanoke
- Mr. Hellkamp discussed billing and coding issues and the system used at Insight Imaging-Roanoke to record this information
- Mr. Hellkamp discussed who is responsible for making sure that medication used in ESIs is safe
- Mr. Hellkamp discussed the contents of the Insight Imaging website
- Mr. Hellkamp discussed the core values of Insight Imaging
- Mr. Hellkamp discussed the correspondence with the Virginia Department of Health and the CDC
- Mr. Hellkamp discussed the relationship between Insight Health Corp. and Image Guided Pain Management, P.C.

**Karen DeLong**

- May 8, 2013
- 142 pages
  - Deposition started at 9:15 a.m. and lasted until 12:03 p.m.
  - The deposition lasted 2 hours and 48 minutes
- The plaintiff noticed the deposition
  - The plaintiff attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - Insight Health Corp. attended by counsel
- Ms. DeLong is an x-ray tech who does CT and pain management work at Insight Imaging-Roanoke
  - Ms. DeLong discussed how she did her pain management work
  - Ms. DeLong discussed who drew the medication for the injection
  - Ms. DeLong discussed her involvement in ESIs
  - Ms. DeLong discussed the paperwork given to patients receiving ESIs
  - Ms. DeLong discussed when Pfizer medication would be used and when NECC medication would be used
  - Ms. DeLong discussed when, why and how the facility started getting medication from NECC
  - Ms. DeLong discussed the process of ordering medication from NECC
  - Ms. DeLong discussed the receipt and storage of medication from NECC
  - Ms. DeLong discussed what information came with an NECC package of medication
  - Ms. DeLong discussed how NECC had become inconsistent with its paperwork and how medication came in without the right paperwork
  - Ms. DeLong discussed how she looked for missing microbiology reports
  - Ms. DeLong discussed Mr. Wingate's injection
  - Ms. DeLong discussed the NECC recall



- Ms. DeLong discussed her communications with the Virginia Department of Health about the outbreak
- Ms. DeLong discussed the computer system used at the facility

**Shawn Wright**

- May 8, 2013
- 41 pages
  - Started at 2:25 p.m. and lasted until 3:05 p.m.
  - The deposition lasted 40 minutes
- The plaintiff noticed the deposition
  - The plaintiff attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - Insight Health Corp. attended by counsel
- Ms. Wright is a tech assistant at Insight Imaging-Roanoke
  - Ms. Wright discussed what she did in regards to pain management procedures including cervical injections and ESIs
  - Ms. Wright discussed her involvement with the RIS system at Insight Imaging-Roanoke
  - Ms. Wright discussed the training Insight Health Corp. gave when it took over the facility
  - Ms. Wright discussed her knowledge of the recall by NECC

**Sarah Nicole Ulrich**

- May 8, 2013
- 97 pages
  - Deposition started at 3:20 p.m. and lasted until 6:00 p.m.
  - The deposition lasted 2 hours and 40 minutes
- The plaintiff noticed the deposition
  - The plaintiff attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - Insight Health Corp. attended by counsel
- Ms. Ulrich is the office supervisor at the Insight Imaging-Roanoke facility
  - Ms. Ulrich discussed how patients are greeted when they come in for an ESI and what information is taken from that patient
  - Ms. Ulrich discussed what information is entered into the computer system for billing purposes

- Ms. Ulrich discussed who handles billing
- Ms. Ulrich discussed her involvement with ordering medication
- Ms. Ulrich discussed what information she sent to NECC and what information she received from NECC
- Ms. Ulrich discussed how she looked for missing microbiology reports
- Ms. Ulrich discussed training on Insight Imaging's core values
- Ms. Ulrich discussed HIPPA issues

**Sharon Boros**

- May 9, 2013
- 120 pages
  - No starting or ending time listed
- The plaintiff noticed the deposition
  - The plaintiff attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - Insight Health Corp. attended by counsel
- Ms. Boros is a CT technologist and a pain management technologist at Insight Imaging-Roanoke
  - Ms. Boros discussed her involvement with NECC
  - Ms. Boros discussed microbiology reports from NECC
  - Ms. Boros discussed looking for missing microbiology reports and which lots were missing microbiology reports
  - Ms. Boros discussed training on Insight's core values
  - Ms. Boros discussed the ESI process and her involvement with that process
  - Ms. Boros described the medication made by NECC
  - Ms. Boros discussed the difference between the 40 mg vials and the 80 mg vials
  - Ms. Boros discussed the paperwork given to patients receiving ESIs
  - Ms. Boros discussed the storage of NECC paperwork
  - Ms. Boros discussed the notebook she made regarding her job duties

**John M. Mathis, M.D.**

- May 21, 2013
- 195 pages
  - Deposition started at 1:00 p.m. and lasted until 6:53 p.m.
  - The deposition lasted 5 hours and 53 minutes
- The plaintiff noticed the deposition
  - The plaintiff attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel

- Drs. Mathis and O'Brien attended by counsel
  - Insight Health Corp. attended by counsel
- Dr. Mathis was a physician with Image Guided Pain Management, P.C.
  - Dr. Mathis discussed his work once Insight Imaging purchased the facility
  - Dr. Mathis discussed his compensation with Carilion and with Insight Imaging
  - Dr. Mathis discussed his supposed LinkedIn page
  - Dr. Mathis discussed the ESI process
  - Dr. Mathis discussed the 2011 case
  - Dr. Mathis discussed why they switched to a preservative free format
  - Dr. Mathis discussed how the procedure notes are created
  - Dr. Mathis discussed his conversations with Insight about issues regarding the meningitis outbreak
  - Dr. Mathis discussed the indemnification agreement with Insight
  - Dr. Mathis discussed the division of responsibilities under the purchase agreement

**Robert F. O'Brien, M.D.**

- May 22, 2013
- 112 pages
  - Deposition started at 9:47 a.m. and lasted until 1:52 p.m.
  - The deposition lasted 4 hours and 15 minutes
- The plaintiff noticed the deposition
  - The plaintiff attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - Insight Health Corp. attended by counsel
- Dr. O'Brien is a physician with Image Guided Pain Management, P.C.
  - Dr. O'Brien discussed the cross-claim filed against Insight Health Corp.
  - Dr. O'Brien discussed the responsibilities of Insight under the purchase agreement
  - Dr. O'Brien discussed the fact neither he nor Dr. Mathis were the medical director at the facility
  - Dr. O'Brien discussed the ESI process for a patient
  - Dr. O'Brien discussed the injection Mr. Wingate received
  - Dr. O'Brien discussed his conversations with people from the Virginia Department of Health
  - Dr. O'Brien discussed what he did once he learned about the recall
  - Dr. O'Brien discussed with whom at Insight/CDI he spoke about the outbreak
  - Dr. O'Brien discussed the relationship between Insight and Image Guided

**Rose Durham**

- July 9, 2013
- 64 pages
  - Deposition started at 10:00 a.m. and lasted until 11:22 a.m.
  - The deposition lasted 1 hour and 22 minutes
- The plaintiff noticed the deposition
  - The plaintiff attended by counsel
  - Insight Health Corp. attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
- Ms. Durham is an MRI technologist who had no involvement with the pain management practice
  - She did not treat Mr. Wingate
  - She is not involved in billing practices
  - She helped Sharon Boros look for the missing microbiology reports

**Therese Laucella:**

- July 9, 2013
- 49 pages
  - Deposition started at 11:25 a.m. and lasted until 12:10 p.m.
  - The deposition lasted 45 minutes
- The plaintiff noticed the deposition
  - The plaintiff attended by counsel
  - Insight Health Corp. attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
- Ms. Laucella is a radiologist technologist who had some involvement in pain management procedures
  - She had no real involvement in the case. It was thought that she was involved in searching for the missing microbiology reports, but she did not recall having any involvement in that
  - She did not treat Mr. Wingate

**Linda Pino**

- November 12, 2013
- 183 pages
  - Deposition started at 10:45 a.m. and lasted until 3:00 p.m.
  - The deposition lasted 4 hours and 15 minutes
- Insight Health Corp. noticed the deposition

- The plaintiff attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - Insight Health Corp. attended by counsel
- Ms. Pino worked at NECC from June 24, 2002 until April 13, 2011
  - Ms. Pino worked in sales positions at NECC
  - Ms. Pino sold for Ameridose as well
  - Ms. Pino discussed NECC was like when she started there and how it grew over time
  - Ms. Pino discussed the reports that would be given to customers regarding sterility testing
  - Ms. Pino discussed the ordering process for customers of NECC including the process for methylprednisolone acetate
  - Ms. Pino discussed her understanding of what the lab and the lab technicians would do in regards to medication and sterility testing
  - Ms. Pino sold to what became Insight Imaging-Roanoke (then Center for Surgical Excellence) once
  - Ms. Pino discussed her understanding of Board of Pharmacy inspections from various states and her understanding of FDA inspections
  - Ms. Pino discussed her understanding of the growth of the recycling/waste facility next to NECC
  - Ms. Pino discussed her understanding of where NECC got the formulas for the products it made

**Patricia Blank**

- November 13, 2013
- 148 pages
  - Deposition started at 9:13 a.m. and lasted until 3:00 p.m.
  - The deposition lasted 5 hours and 47 minutes
- The plaintiff noticed the deposition
  - The plaintiff attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - Insight Health Corp. attended by counsel
- Ms. Blank is the executive vice president of Insight Health Corp.
- Ms. Blank was designated as a corporate representative for Insight Health Corp.
  - Ms. Blank discussed the IRIS system (also called RIS system)
  - Ms. Blank discussed how she would be involved in implementing the systems in facilities Insight purchased
  - Ms. Blank discussed how Dell took over billing for Insight

- Ms. Blank discussed how Insight has independent contractor relationships with the doctors to provide radiology services
- Ms. Blank discussed billing issues in regards to J codes and NDCs and how they were incorporated into the IRIS system
- Ms. Blank discussed what information needs to go into the IRIS system
- Ms. Blank discussed how Insight trained the Roanoke employees after the purchase
- Ms. Blank discussed how she came to Roanoke to observe pain management procedures

**Scott McKee**

- November 13, 2013
- 119 pages
  - Deposition started at 3:17 p.m. and lasted until 6:46 p.m.
  - The deposition lasted 3 hours and 29 minutes
- The plaintiff noticed the deposition
  - The plaintiff attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - Insight Health Corp. attended by counsel
- Mr. McKee was designated as a corporate representative for Insight Health Corp.
  - At the time of the deposition, he was the Chief Development Officer with Center for Diagnostic Imaging
    - He worked at Insight Health Corp. from August 2008 through October 2012
  - Mr. McKee discussed the corporate structure and the entities that own Insight
  - Mr. McKee discussed the organizational management structure for Insight and CDI
  - Mr. McKee discussed how the Roanoke facility was acquired by Insight Imaging
  - Mr. McKee discussed the financial statements for Insight Imaging
  - Mr. McKee discussed billing services for Insight Imaging
  - Mr. McKee discussed the contents of Insight Imaging's website and Insight's understanding as to whether the statements on the website are accurate
  - Mr. McKee discussed whether Dr. Mathis agreed to be medical director

**Linda Massaro, R.N.**

- November 14, 2013
- 168 pages
  - Deposition started at 8:59 a.m. and lasted until 3:15 p.m.

- The deposition lasted 6 hours and 16 minutes
- The plaintiff noticed in the deposition
  - The plaintiff attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - Insight Health Corp. attended by counsel
- Ms. Massaro was designated as a corporate representative for Insight Health Corp.
  - Ms. Massaro discussed how she went to the Roanoke facility for site visits
  - Ms. Massaro discussed the communications from Mr. Hellkamp regarding the NECC notice of recall
  - Ms. Massaro discussed the recall and notification of patient process
  - Ms. Massaro discussed communications and interactions with the Virginia Department of Health
  - Ms. Massaro discussed quality meeting minutes
  - Ms. Massaro discussed how CDI affiliates are no longer allowed to get compounded products
  - Ms. Massaro discussed how she discussed the one prescription per vial of medication issue with people at the Roanoke facility prior to the meningitis outbreak
  - Ms. Massaro discussed how she was told by Dr. Harper that Mr. Wingate died as a result of the injection

#### **Tammy Mabry**

- November 25, 2013
- 126 pages
  - Deposition started at 2:03 p.m. and lasted until 4:27 p.m.
  - The deposition lasted 2 hours and 24 minutes
- The plaintiff noticed the deposition
  - The plaintiff attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - Insight Health Corp. attended by counsel
  - Ms. Mabry attended as did her counsel
- Ms. Mabry developed meningitis in 2011 after receiving injections at Insight Imaging-Roanoke

#### **Lex Parker Gibson**

- December 2, 2013
- 112 pages



- Deposition started at 10:01 a.m. and lasted until 11:48 a.m.
  - The deposition lasted 1 hour and 47 minutes
- Insight Health Corp. noticed the deposition
  - The plaintiff Ms. Wingate attended by counsel
  - The plaintiffs Ferman Werts, Patrick Johnston and Chance Baker attended by counsel
  - Insight Health Corp. attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - The Virginia Department of Health attended by counsel
- Mr. Gibson works for the Office of Epidemiology, Division of Surveillance and Investigation
  - Mr. Gibson discussed the investigation of the meningitis outbreak

**Stephanie L. Harper, M.D.**

- December 2, 2013
- 114 pages
  - Deposition started at 12:59 p.m. and lasted until 2:56 p.m.
  - The deposition lasted 1 hour and 57 minutes
- Insight Health Corp. noticed the deposition
  - The plaintiff Ms. Wingate attended by counsel
  - The plaintiffs Ferman Wertz, Patrick Johnston and Chance Baker attended by counsel
  - Insight Health Corp. attended by counsel
  - Image Guided Pain Management, P.C. attended by counsel
  - Drs. Mathis and O'Brien attended by counsel
  - The Virginia Department of Health attended by counsel
- Dr. Harper is the district director of the Roanoke City Health Department
  - Dr. Harper discussed her the Virginia Department of Health's investigation into the recall
  - Dr. Harper discussed the involvement with Insight Imaging-Roanoke as part of the recall and her involvement with Insight on a corporate level

**Sharon Boros**

- She was deposed again on January 8, 2014, but her deposition was never transcribed
- The plaintiff noticed this deposition
  - We do not have a list of who is present, but my recollection is that all parties in the *Wingate* attended by counsel
- This deposition was in regards to the notebook she created about her job duties



Amy Tharp, M.D.

- Dr. Tharp was deposed on January 8, 2014, but her deposition was never transcribed
- We do not have a notice for this (it would have been one of the defendants, most likely Insight Health Corp.)
  - We do not have a list of who is present, but my recollection is that all parties in the *Wingate* attended by counsel
- This deposition was in regards to her involvement in determining the cause of Mr. Wingate's death

**CHANCE EVERETT BAKER v. ALAUNUS PHARMACEUTICAL, LLC and IMAGE GUIDED PAIN  
MANAGEMENT and INSIGHT HEALTH SERVICES CORP. et al and ROBERT F. O'BRIEN, MD**

Roanoke City Circuit Court -- Case No. CL13-451

Western District of Virginia - Case No. 7:14-cv-00095-MFU

MDL Case No. - 1:14-cv-12421-RWZ

O'Brien/IGPM's Answers to Pl's 1 <sup>st</sup> INT/RPD	03/29/2013
Insight Defs' Objections to Pl's 1 <sup>st</sup> INT/RPD	04/09/2013
Insight's Responses to Plaintiff's 1 <sup>st</sup> INT/ RPD	08/07/2013
Insight's Responses to Plaintiff's 1 <sup>st</sup> RFA	12/16/2013

**DEPOSITIONS**

Dr. Harper Deposition (Va. Dept of Health)	12/2/2013
(113 pages)	
Mr. Lex Gibson deposition (Va Dept. of Health)	12/2/2013
(112 pages)	
Carilion Corporate Depositions	
George Vaughn	1/7/2014
Ms. Sharon M. Bass	1/7/2014
(over 100 pages total)	
Karen DeLong, Insight Deposition	1/8/14
(74 pages)	
Dr. Mathis Deposition	1/8/14
Dr. Obrien Deposition	1/9/14

(64 pages)

Dr. Kierkering / Infectious Disease Doctor

2/27/14

(142 pages)

Plaintiff / Plaintiff's Wife

3/5/14

(300 plus pages)

#### **ORDERS**

- Protective Order / PTSO were only orders
- Order to allow third party defendants

2/18/14